

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN  
DISTRICT OF TENNESSEE, EASTERN DIVISION

FILED BY *[Signature]* D.C.  
05 DEC -2 PM 2:46

JACOB RHODES, et al.

THOMAS M. GOULD  
CLERK, U.S. DISTRICT COURT  
WD OF TN, MEMPHIS

Plaintiffs,

vs.

No. 04-1191-T/P *[Signature]*

SUSAN WALLACE, Individually, and  
HENDERSON COUNTY BOARD  
OF EDUCATION,

Defendants,

BRYAN MOONEY, et al.,

Plaintiffs,

vs.

No. 04-1190-T/P

SUSAN WALLACE, Individually, and  
HENDERSON COUNTY BOARD  
OF EDUCATION,

Defendants,

ZACHARY ROBBINS, et al.

Plaintiffs,

vs.

No. 04-1294-T/P

SUSAN WALLACE, Individually, and  
HENDERSON COUNTY BOARD  
OF EDUCATION,

Defendants,

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CLERK, U.S. DISTRICT COURT  
WD OF TN, MEMPHIS

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**DALTON DYER, et al.,**

**Plaintiffs,**

**vs.**

**No. 05-1004-T/P**

**SUSAN WALLACE, Individually, and  
HENDERSON COUNTY BOARD  
OF EDUCATION,**

**Defendants,**

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**HALEY NICOLE RHODES, et al.,**

**Plaintiffs,**

**vs.**

**No. 05-1020-T/P**

**SUSAN WALLACE, Individually, and  
HENDERSON COUNTY BOARD  
OF EDUCATION,**

**Defendants,**

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#### **AGREED PROTECTIVE ORDER**

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It appearing to the Court, as evidenced by the signatures herein below of counsel for the respective parties to this cause, that the parties have agreed that the production of the following described records and documents should be subject to this Agreed Protective Order:

1. Any and all records relating to any minor, whether produced by Plaintiffs or Defendants;
2. The psychological/psychiatric records of any party;
3. The medical records of any party;

4. TBI, DCS or other governmental investigation records relating to any minor or Susan Wallace; and

5. The academic records of any minor.

All records produced by any and all parties that are subject to this Protective Order shall be used for these cases only and for no other purpose. At the conclusion of this case, all such records shall be returned to the party that originally produced them, or shall be destroyed.

The introduction of these records at trial shall be subject to the Federal Rules of Evidence, and nothing in this Order shall restrict the use of the records at the trials of the above-styled cases.

This Agreed Protective Order may be amended by agreement or by Motion for good cause shown.

Entered this 2 day of December, 2005

  
\_\_\_\_\_  
JUDGE

APPROVED FOR ENTRY:

Respectfully submitted,

SPRAGINS, BARNETT, COBB & BUTLER, PLC

By: 

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# Notice of Distribution

This notice confirms a copy of the document docketed as number 71 in case 1:04-CV-01191 was distributed by fax, mail, or direct printing on December 7, 2005 to the parties listed.

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Honorable James Todd  
US DISTRICT COURT